

SCPPA South Carolina Pulp & Paper Association

The following comments are provided on behalf of the South Carolina Pulp and Paper Association (SCPPA) regarding the draft Network Description and Ambient Air Monitoring Network Plan (PLAN).

SCPPA very much appreciates the opportunities provided by the South Carolina Department of Health and Environmental Control (SCDHEC) for stakeholder involvement in the process of evaluating some of the monitor sites (to date) and the PLAN. The opportunity provided by SCDHEC for several stakeholder groups across the State to provide input to the PLAN and assist SCDHEC in evaluating the sites to determine compliance with the requirements of 40 CFR 58 Appendices A, C, D and E should be commended.

SCPPA recommends that an explicit statement be included in the PLAN summary that emphasizes SCDHEC's commitment to meet all of the "musts" in the regulation and as many of the "shoulds" as possible in the regulation and guidance. SCPPA recommends that the PLAN explicitly state that SCDHEC is committed to meet all of the "musts" and as many of the "shoulds" as possible as recommended in the Federal Regulations and monitoring siting guidance. Questions and uncertainty regarding the legitimacy of the data will be minimized if a consistent approach, in accordance with the regulation and guidance, is taken to ensure the most suitable monitor location. This will allow South Carolina to collect data with certainty, and at the same time, resolve legitimate air quality issues with confidence. Therefore, this defined approach to determine the most suitable monitor location will only assist in improving the quality of ambient air data collection. This is a must in this day and age of ever-decreasing National Ambient Air Quality Standards and of increasing intensity for the need of representative, accurate and reliable monitoring data.

SCPPA recommends for the PLAN to be more specific with respect to replacing monitors that were found to have compliance issues during site evaluations. In several places throughout the PLAN, future plans for individual monitors are not specific enough to clearly state that a monitor will be moved. This is a particular problem where site evaluations have shown that the required siting criteria are not being met. SCPPA recommends that the PLAN be revised to clearly state the intention to bring these sites into compliance if possible or to find a new, compliant site as soon as possible. As stated earlier, The "redlined" version of the PLAN is enclosed and will reflect our recommendations to revise the description of needs at these sites.

SCPPA recommends that SCDHEC immediately pursue discontinuing monitors that are inappropriately sited. Additionally, SCDHEC should indicate which sites are to be used for monitoring near local sources (e.g., special purpose monitors). Special purpose monitors should utilize alternative means of measuring pollutants so the data are not eligible for determining compliance with National Ambient Air Quality Standards (NAAQS). SCPPA recognizes SCDHEC's desire to monitor air quality in close proximity to certain sources (e.g., near quarries, ports, industrial facilities, dusty roads, etc.). However, federal regulations and monitor siting guidance, specifically recommend maintaining a reasonable distance from sources if data is to be used for comparison to NAAQS. The reason is locating monitors in close proximity biases the resulting data high to extremely high, depending on the distance from the source. Neighboring states have confirmed that they do not locate monitors in close proximity to local sources, thus avoiding this problem entirely. Resulting data from neighboring states confirms that no elevated PM₁₀ data exists despite the presence of similar sources.

SCPPA proposes that the PLAN include recommendations for discontinuing or relocating existing monitors located in very close proximity to local sources (e.g., Cayce CMS, Georgetown CMS, and Howard High School). However, it is SCPPA's recommendation that if special purpose monitoring is determined to be necessary, then one (1) of the following two (2) methods should be utilized to collect the data:

- a) Utilizing temporary monitors that are operated no longer than necessary to determine compliance status (e.g., 4 to 6 weeks) and then discontinued.
- b) Utilizing an alternate monitoring device (not FRM or FEM) to obtain special purpose data; but effectively disqualify that data from being used for comparison to National Ambient Air Quality Standards.

It is SCPPA's belief that the above methods will allow for SCDHEC to monitor air quality in close proximity to certain sources (e.g., near quarries, ports, industrial facilities, dusty roads, etc.) and at the same time ensure that the collected data will never be eligible for comparison to the NAAQS.

SCPPA recommends that the PLAN clearly identify which monitors will be used as Standard No. 2 and Standard No. 7 background monitors and that the PLAN clearly identify that these monitors are sufficient. SCPPA supports the PLAN's recommendation in eliminating many SO₂, NO_x, CO, and particulate monitors around the state that are no longer relevant because historical ambient air quality measurements have been well below state and federal standards. However, it is the position of SCPPA that it is important to maintain a sufficient number of monitors in all three (3) regions (Upstate, Central Midlands, and Coastal Plain) to meet the requirements for permitting new major sources and to demonstrate compliance with Standard No. 2 – Ambient Air Quality Standards. SCPPA recommends that the PLAN specifically identify which monitors will be utilized to provide “background” air quality data for each criteria pollutant in each of the three (3) regions.

SCPPA recommends that the PLAN be signed and certified by responsible SCDHEC officials. While there is a certification statement in the front of the PLAN which states that the information in the PLAN is complete and accurate; without a signature SCPPA believes that the certification is inadequate. A certification signature will provide an official endorsement of the PLAN and that the PLAN was reviewed by high level SCDHEC officials, which is an important part of the approval process. Lastly, other Southeastern States, including North Carolina and Kentucky have included certification signatures as part of the PLAN.

SCPPA does not support the statement on Page “v” of the PLAN that declares: “All criteria pollutant monitors and samplers are sited and operated consistent with the requirements of 40 CFR 58 and Appendices A (Quality Insurance), C (Methods), D (Network Design) and E (Probe Siting) and data collected by these samplers and monitors is suitable for comparison to the National Ambient Air Quality Standards.” The statement should be modified to say: *“SCDHEC intends to operate its monitoring system with all criteria pollutant monitors and samplers sited and operated in accordance with the requirements of 40 CFR 58 and Appendices A (Quality Insurance), C (Methods), D (Network Design) and E (Probe Siting). As such SCDHEC intends that the data collected by these samplers and monitors is suitable for comparison to the National Ambient Air Quality Standards.”* SCPPA recommends that the PLAN state that an ISO 14001-type environmental audit was performed for fifteen monitoring sites by an audit team consisting of senior air quality experts from SCDHEC and

environmental professionals from three (3) stakeholder groups and that SCDHEC fully endorses the field audits that were performed. Additionally, SCPPA recommends that the table titled “PM_{2.5} Sites” on Page “8” of the PLAN indicate that the PM_{2.5} monitors at Greenville CHD, Taylors, West View, Irmo, and Bates House were determined, during the audit, to violate one or more requirements of 40 CFR 58 and, as a result, may not be suitable for comparison to the NAAQS. SCPPA also proposes that the PLAN indicate that the remaining PM_{2.5} monitors will be audited within the next few months in accordance with the audit checklist. A footnote under the table should be added that indicates the monitor’s suitability for comparison to the NAAQS is uncertain until the audit process is complete. SCPPA recommends that the audit checklist be referenced in the PLAN and included as an attachment so it becomes information that EPA can utilize in making decisions to approve key elements of the PLAN. Please see the audit checklist, which is enclosed.

Additionally, SCPPA recommends that a statement be included in the PLAN confirming SCDHEC’s commitment to include specific corrective actions to resolve as many of the audit findings as possible so that all monitors and samplers are operated consistently with applicable requirements.

The above paragraph highlights just a few examples of SCPPA’s redline comments of the PLAN (see enclosed). All changes included in the “redlined” version of the PLAN are considered to be the complete set of comments from SCPPA. As such, SCPPA respectfully requests for SCDHEC to consider and address all comments as redlined in the plan in addition to the topics included in this summary.